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FISHER & PHILLIPS LLP  
3993 Howard Hughes Parkway, Suite 650  
Las Vegas, Nevada 89109

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

TRUSTEES OF TEAMSTERS  
LOCAL 631 SECURITY FUND  
FOR SOUTHERN NEVADA,

Plaintiff,

vs.

NATIONAL CONVENTION  
SERVICES, INC., a revoked New  
York corporation; JOSEPH A.  
SANTAMORENA, an individual  
doing business as NATIONAL  
CONVENTION SERVICE; and  
WESTERN SURETY  
COMPANY,

Defendants.

CASE NO.: 2:07-cv-01348-LRH-LRL

**STIPULATION, REQUEST AND  
ORDER FOR EXTENSION  
OF TIME TO FILE DEFENDANTS'  
OPPOSITION TO PLAINTIFF'S  
APPLICATION FOR DEFAULT  
JUDGMENT**

**(Second Request)**

Plaintiff Trustees of Teamsters Local 631 Security Fund for Southern Nevada ("Plaintiff"), and Defendant National Convention Services, Inc., ("Defendant"), by and through their respective counsel, hereby respectfully submit this Stipulation, Request and Proposed Order for Extension of Time to File Defendant's Opposition to Plaintiff's Application for Default Judgment. This Stipulation is made in accordance with LR 6-1, LR 6-2, and LR 7-1 of the Local Rules of this Court.

1       On October 3, 2008, Defendant filed its Motion for Extension of Time to File  
2 Opposition to Plaintiff's Application for Default Judgment and [Proposed] Order  
3 Thereon ("Motion"). The Order granting Defendant's Motion was signed on October  
4 7, 2008, granting Defendant until October 23, 2008, within which to oppose the  
5 Motion.  
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7       The parties have engaged in good faith settlement negotiations and make this  
8 request for extension of time in an effort to afford further negotiations in anticipation  
9 of settling this matter.

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1       Upon agreement of the parties, Plaintiff and Defendant respectfully request this  
2 Court grant Defendant an additional twenty-one (21) days to file its response to the  
3 Motion, up to and including November 13, 2008. By entering into this Stipulation,  
4 Defendant does not waive any rights it has under statute, law, or rule to challenge or  
5 oppose Plaintiff's Motion.  
6

7       DATED this \_\_\_\_ day of October, 2008.

8       BROWNSTEIN, HYATT  
9       FARBER SCHRECK, LLP

10       \_\_\_\_\_  
11       /s/ Michael Infuso, Esq.

12       Michael Infuso, Esq.  
13       100 City Parkway, Ste. 1600  
14       Las Vegas, NV 89106  
15       Attorney for Plaintiff

16       DATED this \_\_\_\_ day of October, 2008.

17       FISHER & PHILLIPS LLP

18       \_\_\_\_\_  
19       /s/ Jeffrey D. Winchester

20       Mark J. Ricciardi, Esq  
21       Jeffrey D. Winchester, Esq.  
22       3993 Howard Hughes Pkwy, Ste. 650  
23       Las Vegas, NV 89169  
24       Attorneys for Defendants

25       **ORDER**

26       IT IS SO ORDERED this 24th day of October, 2008.



27       \_\_\_\_\_  
28       LARRY R. HICKS  
29       UNITED STATES DISTRICT JUDGE